

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In re:</b>  <b>TALEN ENERGY SUPPLY, LLC, <i>et al.</i>,</b>  <b>Debtors.<sup>1</sup></b>	<b>§ § § § § § § §</b>	<b>Chapter 11</b>  <b>Case No. 22-90054 (MI)</b>  <b>(Jointly Administered)</b> <b>(Re: Docket Nos. 8, 119)</b>
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**CERTIFICATE OF NO OBJECTION OF REVISED PROPOSED SECOND INTERIM  
ORDER ESTABLISHING (A) NOTIFICATION PROCEDURES AND APPROVING  
RESTRICTIONS ON CERTAIN TRANSFERS OF INTERESTS IN DEBTORS  
AND CLAIMING OF CERTAIN WORTHLESS STOCK DEDUCTIONS, AND  
(B) A RECORD DATE REGARDING THE OWNERSHIP OF CLAIMS AGAINST  
DEBTORS WITH RESPECT TO POTENTIAL CLAIMS TRANSFER PROCEDURES  
PURSUANT TO SECTIONS 362 AND 105(a) OF BANKRUPTCY CODE**

1. On May 10, 2022, Talen Energy Supply, LLC and its debtor affiliates in the above-captioned chapter 11 cases, as debtors and debtors in possession (collectively, the “**Debtors**”), filed the *Emergency Motion of Debtors Pursuant to Sections 362 and 105(a) of the Bankruptcy Code for Interim and Final Orders Establishing Notification Procedures and Approving Restrictions on (A) Certain Transfers of Interests in, and Claims against, Debtors, and (B) Claiming of Certain Worthless Stock Deductions* [Docket No. 8] (the “**Motion**”), with a proposed order granting the relief requested in the Motion attached thereto as Exhibit A (the “**Initial Proposed Final Order**”). Objections to the Initial Proposed Final Order were required to be filed and served on or prior to June 3, 2022 (the “**Objection Deadline**”).

2. On June 3, 2022, the Debtors (i) filed a *Notice of Adjournment of (I) Final Hearing on NOL Motion, Utilities Motion, Cash Management Motion, DIP Financing Motion and*

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<sup>1</sup> A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/talenenergy>. The Debtors’ primary mailing address is 1780 Hughes Landing Boulevard, Suite 800, The Woodlands, Texas 77380.

*Hedging Motion, and (II) Hearing on Retail Rejection Motion* [Docket No. 392] adjourning the hearing on the Motion to June 17, 2022 at 2:00 p.m. (prevailing Central Time) and (ii) extended the Objection Deadline for certain parties to June 13, 2022 at 12:00 p.m. (Prevailing Central Time), which deadline was subsequently extended, solely with respect to certain parties, to June 14, 2022, at 5:00 p.m. (prevailing Central Time) (the “**Extended Objection Deadline**”).

3. In accordance with paragraph 44 of the *Procedures for Complex Cases in the Southern District of Texas*, the undersigned counsel files this Certificate of No Objection and represents to the Court that (i) more than twenty-four (24) hours have passed since the Extended Objection Deadline, (ii) the undersigned counsel is unaware of any objection to the Motion, and (iii) the undersigned counsel has reviewed the Court’s docket and no objection to the Motion appears thereon.

4. The Debtors received informal comments to the Revised Proposed Second Interim Order from the U.S. Trustee for the Southern District of Texas, counsel to the Official Committee of Unsecured Creditors, and certain other parties in interest, which comments have been incorporated into the revised proposed *Second Interim Order Establishing (A) Notification Procedures and Approving Restrictions on Certain Transfers of Interests in Debtors and Claiming of Certain Worthless Stock Deductions, and (B) A Record Date Regarding the Ownership of Claims against Debtors with Respect to Potential Claims Transfer Procedures Pursuant to Sections 362 and 105(a) Of Bankruptcy Code*, attached hereto as **Exhibit A** (the “**Revised Proposed Second Interim Order**”). A redline of the Revised Proposed Second Interim Order against the Initial Proposed Final Order is attached hereto as **Exhibit B**.

5. Therefore, the Debtors respectfully request entry of the Revised Proposed Second Interim Order.

Dated: June 15, 2022  
Houston, Texas

Respectfully submitted,

/s/ Gabriel A. Morgan

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*Attorneys for Debtors and  
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**Certificate of Service**

I hereby certify that on June 15, 2022, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Gabriel A. Morgan  
Gabriel A. Morgan